

Patrick Selvey

From: Emma Caterine <emma@newyorkconsumerattorney.com>
Sent: Tuesday, September 6, 2022 2:42 PM
To: Nicholas Goodman; Patrick Selvey
Cc: Ahmad Keshavarz
Subject: Farah Jean Francois - depositions, revised scheduling order, verifications, waivers of service, mediation
Attachments: 2022-09-06 waiver Yessica Vallejo.pdf; 2022-09-06 waiver Stavros Orsaris.pdf; 2022-09-06 waiver David Perez.pdf; 2022-09-06 waiver Diane Argyropoulos.pdf; 2022-09-02 third notice of depositions.pdf; 2022-09-06 proposed revised scheduling order.pdf

Counsel,

Please let us know if, in light of the new briefing schedule for the motion to dismiss and new discovery deadline, you would like to take Plaintiff's deposition on a different date than the currently set date of September 22. And please let us know if there are any objections to the dates noticed for defendants' depositions and the topics noticed for the corporate representatives.

Please see attached for the proposed revised scheduling order.

While it does appear that in-house counsel can verify interrogatory responses on behalf of a corporate defendant, only Spartan has verified the responses. Please provide verifications for the remainder of the Defendants by September 9, 2022 at 5 PM.

Please see attached for waivers of service for the new Defendants. Please execute and return by September 9, 2022 at 5 PM, or if you will not be representing Mr. Perez, please provide his last known contact information, specifically his mailing address, phone, and email address.

In regards to mediation, we recommend Joseph DiBenedetto, [please see this link for his website](#). A number of our recent cases were resolved with his help, including a recent case where the Defendants made him presiding a condition of them going to mediation.

Emma Caterine, Esq.
Partner



FDCPA Attorneys: Protecting consumers from
deceptive and unfair debt collection

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